

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<p>ACCESS NOW, INC., a <i>not-for-profit</i> Corporation, ET AL.,</p> <p style="text-align: center;">Plaintiff</p> <p style="text-align: center;">v.</p> <p>HICKORY FARMS, LLC</p> <p style="text-align: center;">Defendant.</p>	<p>2:17-cv-00417</p> <p>LEAD CASE</p> <p>ELECTRONICALLY FILED</p>
<p>LISA FRAZIER,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>CAPITAL TEAS, INC.,</p> <p style="text-align: center;">Defendant.</p>	<p>2:17-cv-00438</p> <p>MEMBER CASE</p> <p>ELECTRONICALLY FILED</p>

NOTICE OF BANKRUPTCY AND EFFECT OF AUTOMATIC STAY

Defendant Capital Teas, Inc. (“Capital Teas”), in accordance with Section 362(a) of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), respectfully submits this Notice of Bankruptcy and Effect of Automatic Stay, and states as follows:

1. On July 11, 2017 (“Petition Date”), Capital Teas filed petitions under Chapter 11 of Title 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Maryland (the “Bankruptcy Court”). The petition is indexed at Case No. 17-19426 and has been assigned to Judge Robert A. Gordon.

2. The petition triggers the “automatic stay” envisioned by Section 362 of the Bankruptcy Code.

3. Section 362(a), *inter alia*, operates as an automatic stay of: (i) the commencement or continuation of a “judicial, administrative, or other action or proceeding” against the debtor in

a bankruptcy petition (11 U.S.C. § 362(a)(1)); (ii) acts to “obtain possession of property” of the debtor’s estates (11 U.S.C. § 362(a)(3)); and (iii) acts to “collect, assess, or recover a claim” against the debtor arising prior to the Petition Date (11 U.S.C. § 362(a)(6)).

4. The above-captioned action constitutes a “judicial, administrative, or other action or proceeding” against Capital Teas, an act to obtain possession of the Capital Teas’s property, and/or an act to collect or recover on a claim against Capital Teas.

5. Accordingly, the above-captioned lawsuit should be stayed, pursuant to 11 U.S.C. § 362(a), as brought against Capital Teas.

6. Any action taken by Plaintiff against the Capital Teas without obtaining relief from the automatic stay from the Bankruptcy Court may be void *ab initio* and may result in a finding of contempt against Plaintiff by the Bankruptcy Court. Capital Teas reserves and retains all of statutory rights to seek relief in Bankruptcy Court from any action, judgment, order, or ruling entered in violation of the Automatic Stay.

Respectfully submitted,

JACKSON LEWIS P.C.

Dated: July 11, 2017

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